

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

JANE DOES 1-9,

Case No.: 7:20-cv-00947-JD

Plaintiffs,

**Application/Affidavit for  
*Pro Hac Vice* Admission**

v.

COLLINS MURPHY, LIMESTONE  
COLLEGE, MG FREESITES, LTD d/b/a  
PORNHUB.COM, and HAMMY MEDIA,  
LTD. d/b/a XHAMSTER.COM,

Defendants.

(1) Name. Theresa Brownell Bowman  
First Middle Last

(2) Residence. I reside in the following state: Washington, DC  
If a South Carolina resident, indicate months/years of residence: \_\_\_\_\_

(3) Business Address. I am an attorney and practice law under the name of or as a member of the  
following firm:

Firm name: Mitchell Silberberg & Knupp LLP  
Mailing address: 1818 N Street NW, 7th Floor City/State/Zip Washington, DC 20036  
Telephone number: 202-470-2752  
Facsimile number: 202-470-2776  
E-mail address: tbb@msk.com  
(Application will not be considered without an e-mail address to receive electronic notification.)

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to  
comply with the applicable statutes, laws, and rules of the State of South Carolina, with all  
applicable federal statutes, laws, and rules, including Local Rules of the United States District  
Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local  
Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the  
District of South Carolina in all matters of attorney conduct.<sup>1</sup>

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the  
District of Columbia where I regularly practice law. **Attached is my certificate of good standing.**

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<sup>1</sup>This District maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules  
of procedure and related materials may be obtained.

(6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good Standing
U.S. District Court for the District of Columbia	– 04/13/2015	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. District Court for the Eastern District of Virginia	– 03/17/2017	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Supreme Court	– 11/04/2019	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Court of Appeals for the District of Columbia Circuit	– 03/20/2020	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
State Bar of the Commonwealth of Virginia	– 10/14/2011	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
State Bar of the District of Columbia	– 03/08/2013	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

(7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? .....  Yes  No  
(If “yes,” give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

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(8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?  
 Yes  No  
(If “yes,” give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

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(9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?  
 Yes  No  
(If “yes,” give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

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(10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  
 Yes  No  
(If “yes,” give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

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(11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?  
 Yes  No

(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

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(12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name: R. Taylor Speer  
Firm Name: Turner Padget Graham & Laney, PA  
Street Address or Post Office Box: PO Box 1509  
City, State, and Zip Code: Greenville, SC 29602  
Telephone Number: (864) 552-4600  
E-Mail Address: tspeer@turnerpadget.com

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I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

(13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

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(14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

(15) Electronic Notification. By submitting this application, I consent to electronic notification.

(16) Represented Party/Parties. I seek to represent the following party/parties:

MG Freesites, Ltd

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(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

Shan Bunn  
Signature of Applicant

Sworn to and subscribed before me  
this 9<sup>th</sup> day of December, 2021.

Pamela S. Burchette  
A Notary Public  
of the State of District of Columbia

My Commission expires: 2/14/2024

Pamela S. Burchette  
Notary Public, District of Columbia  
My Commission Expires 2/14/2024



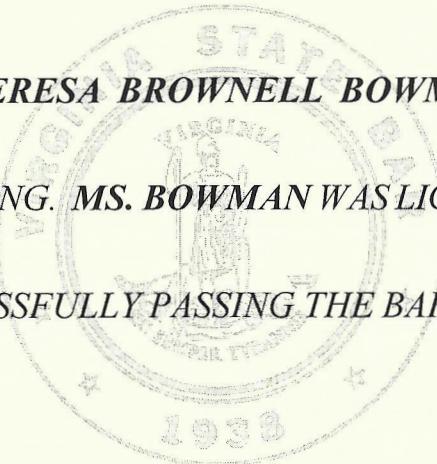
**ATTACHMENT TO APPLICATION  
FOR *PRO HAC* ADMISSION**

(THERESA BROWNELL BOWMAN)

# VIRGINIA STATE BAR

## ***CERTIFICATE OF GOOD STANDING***

*THIS IS TO CERTIFY THAT THERESA BROWNELL BOWMAN IS AN ACTIVE MEMBER OF THE  
VIRGINIA STATE BAR IN GOOD STANDING. MS. BOWMAN WAS LICENSED TO PRACTICE LAW IN VIRGINIA  
ON OCTOBER 14, 2011, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE BOARD  
OF BAR EXAMINERS.*



*Issued November 9, 2021*

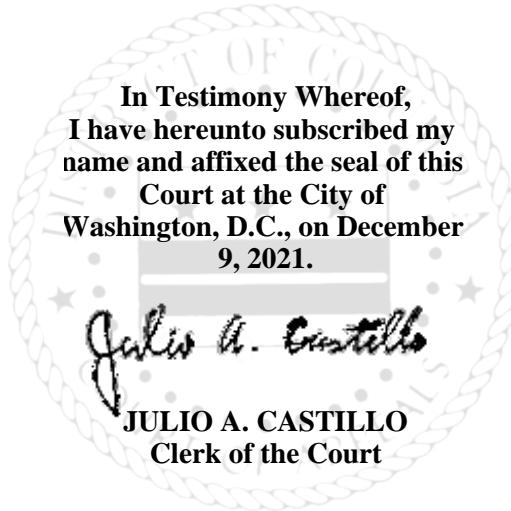
  
KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that

*Theresa Brownell Bowman*

was duly qualified and admitted on March 8, 2013 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, a(n)  
ACTIVE member in good standing of this Bar.



*Julio A. Castillo*  
Issued By:  
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
[memberservices@dcbar.org](mailto:memberservices@dcbar.org).